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April 17, 2024

BY ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *City of Almaty, Kazakhstan, et ano. v. Felix Sater, et al.*,
Case No. 19 Civ. 2645 [rel. 15 Civ. 5345] (JGK) (KHP)**

Dear Judge Koeltl:

We represent Plaintiffs City of Almaty, Kazakhstan and BTA Bank (the “Kazakh Entities”) and write pursuant to Rule 21.8 of the Electronic Case Filing Rules & Instructions of the United States District Court for the Southern District of New York and Paragraph 8 of the Court’s Stipulated Protective Order in this case [ECF No. 51] to request that the Court accept for provisional filing under seal certain exhibits appended to the Declaration of Matthew L. Schwartz In Support Of The Kazakh Entities’ Motions *In Limine*.

Among the documents that the Kazakh Entities cite in their motions *in limine* are documents that have been designated confidential by the defendants or their agents in this action. As such, the Kazakh Entities request that the Court maintain these exhibits under seal until such time that the defendants can explain why the materials should remain under seal. The Court granted a similar request by the Kazakh Entities to seal portions of their opposition papers to defendant MeM Energy LLC’s motion for summary judgment. [ECF No. 477]. To be clear, the Kazakh Entities take no position on the sealing of these papers.

We thank the Court for its attention to this matter.

Respectfully,

/s/ Matthew L. Schwartz

Matthew L. Schwartz

**APPLICATION GRANTED
SO ORDERED**

John G. Koeltl, U.S.D.J.

4/18/24

BOIES SCHILLER FLEXNER LLP